

From: Megan Benett <Mbenett@kreindler.com>
Sent: Saturday, September 25, 2021 4:49 PM EDT
To: Steven R. Pounian <Spounian@kreindler.com>
Subject: RE: Pounian Declaration SRP EDITS 330p
Attachment(s): "Benett Declaration.docx", "Fawcett Declaration.docx", "Hartney Declaration.docx", "Kreindler Declaration.docx", "Maloney Declaration.docx", "Pagan Declaration.docx", "Pounian Declaration.docx", "Ranieri Declaration.docx", "Sienski Declaration.docx", "[REDACTED] Declaration.pdf"

Here are all of the declarations – including mine, which somehow I seem to have forgotten to draft earlier (wishful thinking), even though I named you me...

Let's talk to Fawcett and Jim tomorrow if possible. I'll work on the letter-motion re [REDACTED] now and draft a short letter to be filed with the declarations.

From: Steven R. Pounian
Sent: Saturday, September 25, 2021 3:46 PM
To: Megan Benett <Mbenett@kreindler.com>
Subject: RE: Pounian Declaration SRP EDITS 330p

On the bullet points paragraph when we reference the Court's order we should add the ECF No.

From: Megan Benett <Mbenett@kreindler.com>
Sent: Saturday, September 25, 2021 3:44 PM
To: Steven R. Pounian <Spounian@kreindler.com>
Subject: Re: Pounian Declaration SRP EDITS 330p

Great. I will revise and send to you. It may not be for 45 mins or so.

Sent from my iPhone

On Sep 25, 2021, at 3:39 PM, Steven R. Pounian <Spounian@kreindler.com> wrote:

I can look over the others if you have more changes – just let me know

From: Steven R. Pounian
Sent: Saturday, September 25, 2021 3:39 PM
To: Megan Benett <Mbenett@kreindler.com>
Subject: Pounian Declaration SRP EDITS 330p

I agree – made a few small changes. Thx s

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF MEGAN WOLFE BENETT

I, Megan Wolfe Benett, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney duly admitted to practice before this Court, am a partner at Kreindler & Kreindler LLP (“Kreindler”) and represent the family members of those killed in the 9/11 Terrorist Attacks as well as the survivors of those attacks. I am fully familiar with the history of this lawsuit and this Court’s inquiry into the Yahoo! News article published by Michael Isikoff on July 15, 2021.

2. On June 17, 2021 and June 18, 2021 I took the deposition of Kingdom of Saudi Arabia official Musaed al-Jarrah via Zoom.

3. I learned on July 15, 2021 that Yahoo! News investigative reporter Michael Isikoff had published an article in which he stated that he had obtained a copy of the transcript of the deposition of Jarrah. That morning, I discussed the Isikoff article with others at Kreindler working on the 9/11 litigation and, subsequently, in a conference call with other members of the Plaintiffs’ Executive Committees in this lawsuit.

4. I have no idea how Michael Isikoff obtained a copy of the Jarrah deposition.

5. The paralegal I previously described as having been on the Jarrah transcript distribution list from the court reporting service Golkow Litigation Services was Debra Pagan. See ECF No. 7016 at 3.

6. My specific answers to the inquiry of this Court's Order, ECF No. 7082 at 1, (set forth in italics) are underscored below:

- *identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court;*
 - I had no communications with Michael Isikoff or anyone acting on his behalf.
- *declare whether they have ever discussed the contents of the Musaed Al Jarrah deposition with Michael Isikoff or anyone acting on his behalf. Any communication must be described in detail, including whether portions of the transcript were read or testimony was described;*
 - I have not discussed the contents of the deposition with Michael Isikoff or anyone acting on his behalf.
- *state every person with whom they shared the Al Jarrah deposition transcript who has not already supplied the Court with a declaration in this investigation; and*
 - None.
- *state every person that they know had access to the deposition transcripts who has not already supplied a declaration in this investigation.*
 - None.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: /s/ Megan Wolfe Benett
Megan Wolfe Benett
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF JOHN FAWCETT

I, John Fawcett, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an investigator at Kreindler & Kreindler LLP (“Kreindler”) and am involved in Kreindler’s work in the *In re Terrorist Attacks on September 11, 2001* suit.

2. On June 17, 2021 and June 18, 2021 I attended on Zoom the deposition of Kingdom of Saudi Arabia official Musaed al-Jarrah (“Jarrah”) conducted by Kreindler partner Megan Benett.

3. I learned on July 15, 2021 that Yahoo! News investigative reporter Michael Isikoff had published an article in which he stated that he had obtained a copy of the transcript of the deposition of Jarrah.

4. I have no idea how Michael Isikoff obtained a copy of the Jarrah deposition.

5. My specific answers to the inquiry of this Court’s Order, ECF No. 7082 at 1, (set forth in italics) are underscored below:

- *whether the declarant shared with anyone any portion of the Al Jarrah deposition transcript (either by providing copies of any portion of the transcript, reading any portion of the transcript, or describing it);*

- I shared the Jarrah transcripts with an individual that Kreindler hired as a consultant to assist the 9/11 Families in connection with this lawsuit. (“Consultant A.”) Prior to doing so, I provided Consultant A with copies of the FBI and MDL protective orders in this case and Consultant A returned forms agreeing to abide by the terms of those protective orders. I did not share any portion of the Jarrah transcripts with anyone else.
- *identify and describe all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021.*
- On July 12, 2021, I emailed Michael Isikoff a copy of the unclassified privilege log that the Department of Justice filed in this case on May 6, 2021. **[ANY OTHER COMMUNICATIONS?]**

6. At no other time did I communicate with Michael Isikoff or anyone acting on his behalf between June 1, 2021 and August 1, 2021. I did not provide any portion of the Jarrah transcript to Isikoff or anyone working on his behalf.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: _____
JOHN FAWCETT
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF JOHN HARTNEY

I, John Hartney, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am the head of Information Technology (“IT”) at Kreindler & Kreindler LLP (“Kreindler”) and manage the firm’s email and document systems. In connection with the *In re Terrorist Attacks on September 11, 2001* suit, I am familiar with the system managing retention and sharing of documents and other electronically stored information. I have the ability to search Kreindler email accounts and I have access to all drives within our network. I also have managerial access to Kreindler’s cloud-based document storage system.

2. On July 16, 2021, I was advised that journalist Michael Isikoff published an article the day before on Yahoo! News in which he reported that he had obtained a copy of a redacted deposition transcript of Mussaed al Jarrah and asked to assist with an internal review to determine if Isikoff received it from a source at Kreindler. I was told that the Jarrah deposition took place on June 17, 2021 and June 18, 2021 and that there had been both a rough transcript and a final transcript for both days.

3. In connection with that request, I reviewed Kreindler’s proprietary server, its cloud-based storage system and its email system. Based on my review, I determined the following.

4. The rough Jarrah transcripts were saved on Kreindler's server on June 17, 2021 and June 18, 2021. The final Jarrah transcripts were saved on Kreindler's server on June 29, 2021. The final Jarrah transcript was uploaded to the cloud-based storage system on June 29, 2021. The rough Jarrah transcript was not uploaded to the cloud-based storage system.

5. Only Kreindler employees have access to Kreindler's server. To manage information relating to this lawsuit, I created a network share within the server where all documents can be saved. That share drive is for use only by Kreindler attorneys and staff involved in this litigation. The Jarrah transcripts are saved within that network share. I was told that the following Kreindler attorneys and staff had been able to access the Jarrah transcripts: Jim Kreindler, Steven R. Pounian, Andrew J. Maloney, Megan Wolfe Benett, John Fawcett, Debra Pagan, Julia Sienski or Lisa Ranieri. I did not find any evidence that the Jarrah transcripts had been downloaded, printed or emailed by anyone else.

6. Consultants, experts or others outside of Kreindler can access the Jarrah transcript on the cloud-based storage system if Kreindler provides them access to the system. To view documents saved on that system the documents must be downloaded by the user. The system tracks which users have downloaded documents. On July 29, 2021 I reviewed the user history for the cloud-based system and determined that as of that date no one had downloaded the Jarrah transcript that was saved on the cloud-based storage system.

7. I also conducted a search of Kreindler's email system for any incoming or outgoing messages to misikoff@yahoo-inc.com, misikoff@oath.com and misikoff@verizonmedia.com between June 1, 2021 and August 1, 2021.

8. I also searched the email server for all outgoing and incoming messages during the same time period containing the names “Jarrah” or “Isikoff” or the name that the court reporting service had given to the transcripts when they were originally sent to Kreindler.

9. I determined that the only Kreindler individuals who had received the rough or final Jarrah transcripts from the court reporting service Golkow Litigation Services (“Golkow”) were Jim Kreindler, Steven R. Pounian, Andrew J. Maloney, Megan Wolfe Benett and Debra Pagan.

10. The only incoming or outgoing emails returned as a result of the search described in paragraph seven are attached hereto as Exhibit 1. None of those emails attached documents to them.

11. I determined that on only two occasions between June 1, 2021 and August 1, 2021 was the Jarrah transcript emailed to anyone other than the individuals listed in paragraph five and those two emails were from John Fawcett to a Kreindler consultant (“Consultant A”) and from Debra Pagan to the law firm of Baumeister & Samuels.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: _____
JOHN HARTNEY
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF JAMES KREINDLER

I, James P. “Jim” Kreindler, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney duly admitted to practice before this Court, a partner at Kreindler & Kreindler LLP (“Kreindler”) and co-chair of the Plaintiffs’ Executive Committee for Personal Injury and Wrongful Death Claims.

2. I am fully familiar with the history of this lawsuit and this Court’s inquiry into the Yahoo! News article published by Michael Isikoff on July 15, 2021.

3. On June 17, 2021 and June 18, 2021 I attended on Zoom the deposition of Kingdom of Saudi Arabia official Musaed al-Jarrah conducted by Kreindler partner Megan Benett.

4. I learned on July 15, 2021 that Yahoo! News investigative reporter Michael Isikoff had published an article in which he stated that he had obtained a copy of the transcript of the deposition of Jarrah. That morning, I discussed the Isikoff article with others at Kreindler working on the 9/11 litigation and, subsequently, in a conference call with other members of the Plaintiffs’ Executive Committees in this lawsuit.

5. I have no idea how Michael Isikoff obtained a copy of the Jarrah deposition.

6. My specific answers to the inquiry of this Court's Order, ECF No. 7082 at 1, (set forth in italics) are underscored below:

- *identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court;*
 - I communicated with Michael Isikoff and his producer several times between June 1, 2021 and August 1, 2021. Those communications concerned my appearance along with former FBI Special Agent Ali Soufan on Isikoff's Conspiracyland podcast on July 1, 2021; and Kreindler's efforts to convince the Department of Justice to reverse its position regarding the state secrets privilege and its protective order that prevented 9/11 Families and the public from accessing information developed during discovery.
- *declare whether they have ever discussed the contents of the Musaed Al Jarrah deposition with Michael Isikoff or anyone acting on his behalf. Any communication must be described in detail, including whether portions of the transcript were read or testimony was described;*
 - I never discussed the content of the Jarrah deposition with Isikoff or anyone acting on his behalf..
- *state every person with whom they shared the Al Jarrah deposition transcript who has not already supplied the Court with a declaration in this investigation; and*
 - None.

- *state every person that they know had access to the deposition transcripts who has not already supplied a declaration in this investigation.*
 - None.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: /s/ James P. Kreindler
JAMES P. KREINDLER
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF ANDREW MALONEY

I, Andrew Maloney, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney duly admitted to practice before this Court, a partner at Kreindler & Kreindler LLP (“Kreindler”) and liaison counsel to the Plaintiffs’ Executive Committee for Personal Injury and Wrongful Death Claims.

2. I am fully familiar with the history of this lawsuit and this Court’s inquiry into the Yahoo! News article published by Michael Isikoff on July 15, 2021.

3. On June 17, 2021 and June 18, 2021 I attended on Zoom the deposition of Kingdom of Saudi Arabia official Musaed al-Jarrah conducted by Kreindler partner Megan Benett.

4. I learned on July 15, 2021 that Yahoo! News investigative reporter Michael Isikoff had published an article in which he stated that he had obtained a copy of the transcript of the deposition of Jarrah. That morning, I discussed the Isikoff article with others at Kreindler working on the 9/11 litigation and, subsequently, in a conference call with other members of the Plaintiffs’ Executive Committees in this lawsuit.

5. I have no idea how Michael Isikoff obtained a copy of the Jarrah deposition.

6. On July 16, 2021, I conferred with Kreindler's information systems manager John Hartney and asked him to conduct an analysis of Kreindler's document storage and email systems to determine whether the Jarrah transcript had been sent to anyone outside of Kreindler. The rough and final Jarrah transcripts are saved in a share drive along with materials relating to this lawsuit. Only Kreindler employees can access that share drive. Any Kreindler employee who intends to access materials produced pursuant to the Federal Bureau of Investigation protective order or the MDL protective order, saved on that share drive, must first review those protective orders and agree to be bound by the direction that no materials subject to the protective orders or the information contained therein can be shared with anyone other than Plaintiffs' counsel. No one who has not signed those protective orders is permitted to review protected materials. Only the following Kreindler employees were provided access to the Jarrah transcripts: Jim Kreindler, Steven R. Pounian, myself, Megan Wolfe Benett, John Fawcett, Debra Pagain, Julia Sienski and Lisa Ranieri.

7. Some of the materials produced under the protective orders are uploaded to a cloud-based storage system which our experts and consultants can access. Any consultant or expert who is given permission to access those materials must first review the FBI and MDL protective orders and agree to be bound by them. Mr. Hartney and I reviewed the cloud-based storage system and determined that no one had accessed the Jarrah transcripts saved there.

8. On July 16, 2021, I also asked Mr. Hartney to conduct a search of our email system to determine if the Jarrah transcripts and been sent to anyone other than the individuals listed in paragraph three, above. The only emails forwarding any portion of the Jarrah transcripts went to a Kreindler consultant who had reviewed and agreed to be bound by the FBI and MDL protective orders ("Consultant 1") and to the law firm of Baumeister & Samuels.

9. My specific answers to the inquiry of this Court's Order, ECF No. 7082 at 1, (set forth in italics) are underscored below:

- *identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court;*
 - I had no communications with Michael Isikoff or anyone acting on his behalf.
- *declare whether they have ever discussed the contents of the Musaed Al Jarrah deposition with Michael Isikoff or anyone acting on his behalf. Any communication must be described in detail, including whether portions of the transcript were read or testimony was described;*
 - I have not discussed the contents of the deposition with Michael Isikoff or anyone acting on his behalf.
- *state every person with whom they shared the Al Jarrah deposition transcript who has not already supplied the Court with a declaration in this investigation; and*
 - None.
- *state every person that they know had access to the deposition transcripts who has not already supplied a declaration in this investigation.*
 - None.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: /s/ Andrew J. Maloney
ANDREW J. MALONEY
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF STEVEN R. POUNIAN

I, Steven R. Pounian, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney duly admitted to practice before this Court, am of counsel at Kreindler & Kreindler LLP (“Kreindler”) and represent the family members of those killed in the 9/11 Terrorist Attacks as well as the survivors of those attacks. I am fully familiar with the history of this lawsuit and this Court’s inquiry into the Yahoo! News article published by Michael Isikoff on July 15, 2021.

2. On June 17, 2021 and June 18, 2021 I attended on Zoom the deposition of Kingdom of Saudi Arabia official Musaed al-Jarrah conducted by Kreindler partner Megan Benett.

3. I learned on July 15, 2021 that Yahoo! News investigative reporter Michael Isikoff had published an article in which he stated that he had obtained a copy of the transcript of the deposition of Jarrah. That morning, I discussed the Isikoff article with others at Kreindler working on the 9/11 litigation and, subsequently, in a conference call with other members of the Plaintiffs’ Executive Committees in this lawsuit.

4. I have no idea how Michael Isikoff obtained a copy of the Jarrah deposition.

5. My specific answers to the inquiry of this Court's Order, ECF No. 7082 at 1, (set forth in italics) are underscored below:

- *identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court;*
 - I had no communications with Michael Isikoff or anyone acting on his behalf.
- *declare whether they have ever discussed the contents of the Musaed Al Jarrah deposition with Michael Isikoff or anyone acting on his behalf. Any communication must be described in detail, including whether portions of the transcript were read or testimony was described;*
 - I have not discussed the contents of the deposition with Michael Isikoff or anyone acting on his behalf.
- *state every person with whom they shared the Al Jarrah deposition transcript who has not already supplied the Court with a declaration in this investigation; and*
 - None.
- *state every person that they know had access to the deposition transcripts who has not already supplied a declaration in this investigation.*
 - None.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: /s/ Steven R. Pounian
Steven R. Pounian
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF MEGAN WOLFE BENETT

I, Steven R. Pounian, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney duly admitted to practice before this Court, am a partner at Kreindler & Kreindler LLP (“Kreindler”) and represent the family members of those killed in the 9/11 Terrorist Attacks as well as the survivors of those attacks. I am fully familiar with the history of this lawsuit and this Court’s inquiry into the Yahoo! News article published by Michael Isikoff on July 15, 2021.

2. On June 17, 2021 and June 18, 2021 I took the deposition of Kingdom of Saudi Arabia official Musaed al-Jarrah via Zoom.

3. I learned on July 15, 2021 that Yahoo! News investigative reporter Michael Isikoff had published an article in which he stated that he had obtained a copy of the transcript of the deposition of Jarrah. That morning, I discussed the Isikoff article with others at Kreindler working on the 9/11 litigation and, subsequently, in a conference call with other members of the Plaintiffs’ Executive Committees in this lawsuit.

4. I have no idea how Michael Isikoff obtained a copy of the Jarrah deposition.

5. The paralegal I previously described as having been on the Jarrah transcript distribution list from the court reporting service Golkow Litigation Services was Debra Pagan. See ECF No. 7016 at 3.

6. My specific answers to the inquiry of this Court's Order, ECF No. 7082 at 1, (set forth in italics) are underscored below:

- *identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court;*
 - I had no communications with Michael Isikoff or anyone acting on his behalf.
- *declare whether they have ever discussed the contents of the Musaed Al Jarrah deposition with Michael Isikoff or anyone acting on his behalf. Any communication must be described in detail, including whether portions of the transcript were read or testimony was described;*
 - I have not discussed the contents of the deposition with Michael Isikoff or anyone acting on his behalf.
- *state every person with whom they shared the Al Jarrah deposition transcript who has not already supplied the Court with a declaration in this investigation; and*
 - None.
- *state every person that they know had access to the deposition transcripts who has not already supplied a declaration in this investigation.*
 - None.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: /s/ Megan Wolfe Benett
Megan Wolfe Benett
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF LISA RANIERI

I, Lisa Ranieri, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am a legal secretary at Kreindler & Kreindler LLP (“Kreindler”) and am involved in Kreindler’s work in the *In re Terrorist Attacks on September 11, 2001* suit.
2. I was asked to provide a declaration in connection with this Court’s inquiry into how investigative reporter Michael Isikoff obtained a copy or portions of the deposition transcript of Kingdom of Saudi Arabia official Musaed al-Jarrah (“Jarrah”).
3. I have no idea how Isikoff obtained a copy of the Jarrah transcript.
4. My specific answers to the inquiry of this Court’s Order, ECF No. 7082 at 2, (set forth in italics) are underscored below:
 - *whether the declarant shared with anyone any portion of the Al Jarrah deposition transcript (either by providing copies of any portion of the transcript, reading any portion of the transcript, or describing it);*
 - I shared the Jarrah transcripts with the law firm Baumeister & Samuels. I did not share any portion of the Jarrah transcripts with anyone else.

- *identify and describe all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021.*
 - I have never had any communications with Isikoff or anyone acting on his behalf.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: _____
LISA RANIERI
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF JULIA SIENSKI

I, Julia Sienski, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am a client liaison and case manager at Kreindler & Kreindler LLP (“Kreindler”) and am involved in Kreindler’s work in the *In re Terrorist Attacks on September 11, 2001* suit.
2. I was asked to provide a declaration in connection with this Court’s inquiry into how investigative reporter Michael Isikoff obtained a copy or portions of the deposition transcript of Kingdom of Saudi Arabia official Musaed al-Jarrah (“Jarrah”).
3. I have no idea how Isikoff obtained a copy of the Jarrah transcript.
4. Kreindler paralegal Debra Pagan forwarded to me the email with the rough transcripts of former Kingdom of Saudi Arabia employee Musaed al-Jarrah (“Jarrah”) and the link from court reporters Golkow Litigation Services providing access to the final Jarrah transcripts. I saved the rough Jarrah transcripts on Kreindler’s server on June 17, 2021 and June 18, 2021 and the final Jarrah transcripts on June 29, 2021. I also uploaded the final Jarrah transcript to Kreindler’s cloud-based storage system on June 29, 2021.
5. My specific answers to the inquiry of this Court’s Order, ECF No. 7082 at 2, (set forth in italics) are underscored below:

- i. *whether the declarant shared with anyone any portion of the Al Jarrah deposition transcript (either by providing copies of any portion of the transcript, reading any portion of the transcript, or describing it);*
 - o I have not shared the Jarrah transcript with anyone.
- *identify and describe all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021.*
 - o I have never had any communications with Isikoff or anyone acting on his behalf.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: _____
JULIA SIENSKI
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181